

APR 02 2024

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

U.S. DISTRICT COURT
W. DISTRICT OF N.C.

UNITED STATES OF AMERICA

v.

(1) JENNIFER FOX
[REDACTED]

DOCKET NO. 1:24CR-27-MC-WCM
Filed Under Seal

BILL OF INDICTMENT

Violations:

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)

THE GRAND JURY CHARGES:

COUNT ONE

Beginning in or around March 2023 and continuing until on or about July 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendants,

(1) JENNIFER FOX
[REDACTED]

did knowingly and intentionally conspire and agree with each other, with EARNEST ROBINSON, and with other persons known and unknown to the Grand Jury, to distribute and to possess with intent to distribute a mixture and substance

containing a detectable amount of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Quantity of Methamphetamine (Actual) Involved in Count One

It is further alleged that, with respect to the offense charged in Count One, fifty (50) grams or more of methamphetamine (actual), a Schedule II controlled substance, is attributable to, and was reasonably foreseeable by defendants, (1) **JENNIFER FOX** and [REDACTED]

Accordingly, Title 21, United States Code, Section 841(b)(1)(A) is applicable to, (1) **JENNIFER FOX** and [REDACTED]

COUNT TWO

On or about July 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

[REDACTED]
did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance, said offense involved at least 50 grams of methamphetamine (actual), in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT THREE

On or about July 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendants,

(1) JENNIFER FOX

[REDACTED]

aided and abetted by each other, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance, said offense involved at least 50 grams of methamphetamine (actual), in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT FOUR

On or about July 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

(1) JENNIFER FOX

in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that being possession with intent to distribute a controlled substance, a violation of 21 U.S.C. § 841(a)(1), did knowingly possess a firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 18 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924 and/or Section 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause to believe that the following property seized during the course of the investigation is subject to forfeiture on one or more of the grounds stated above:

1. A Smith & Wesson, .38 caliber revolver;
2. Five .38 caliber rounds of ammunition; and
3. \$27,931.00 in US Currency.

Redacted

GRAND JURY FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY


ANNABELLE CHAMBERS
SPECIAL ASSISTANT UNITED STATES ATTORNEY